

August 23, 2007

Carl Goldstein
Program Manager, Pacific Island Office
USEPA, Region 9
75 Hawthorne Street
San Francisco, CA 94105

REF: High Strength Tank Leak

Dear Mr. Goldstein:

I would like to summarize the incident that occurred on August 21 and further actions to be taken concerning the leaking high strength (HS) tank at our facility at COS Samoa Packing Company.

On August 21, at approximately 4 pm a leak from the bottom of the high strength waste tank was reported to our Utility Manager at home. He came into the plant and after seeing the problem called the Management team. After we all reviewed the problem, we called Mr. Peter Peshut at ASEPA to report the incident and discuss emergency actions.

We requested help from the Blue Moon vessel to take a second trip on August 21 and after dropping the level of the tank, the hydraulic pressure dropped away and the tank was only leaking minimally. The cause of the leak has been determined to be the deteriorating sub-base made from plywood. The tank seal at the outer edge in the location of the leak was compromised. Our temporary fix was to put a large rubber gasket seal material into the gap under the tank edge and then anchor bolt a rolled angle in the concrete to keep the seal from blowing out. The leak has dried up over a 24 hour period and stopped entirely. We did lose some high strength waste estimated to be 50,000 gallons over a 10 hour period that was pumped to the surge tank. However, upon recognizing this problem, we installed a transfer pipe to allow the liquid from the wastewater catchment sump to be pumped back to the high strength tank.

The following is a recount of the log sheets for HS pumped to the vessel so far this week:

August 20 – Monday	Trip 1 – 92,833 gallons
	Trip 2 – No trip
August 21 – Tuesday	Trip 1 – 10,554 gallons
	Trip 2 – 69,077 gallons
August 22 – Wednesday	Trip 1 – 36,211 gallons
	Trip 2 – 61,846 gallons
August 23 – Thursday	Trip 1 – 66,204 gallons
	Trip 2 – No trip

We have determined a temporary fix will be necessary the week end of September 1,2,and 3. We have ordered some two part underwater epoxy called Splash Zone to be air freighted that will be placed in the bottom corner edges making a coving that will harden and cannot be penetrated by the HS. Additionally, we are working with the tank vendor to plan a tank bottom replacement during our extended shutdown from December 22 thru January 7. A set of 7 photographs will be attached to the submittal email showing the tank bottom repair and piping for pumping back to HS tank.

We understand the seriousness of this situation, have an action plan for repairs and will continue to advise EPA of any further developments regarding this issue.

Sincerely,

James L. Cox, Director of Engineering
Chicken of the Sea Intl

Cc: Peter Peshut, Manager ASEPA
Willem Martins, GM Samoa Packing